

# EXHIBIT A

6  
Wm  
4/26/13  
1114

1 SUMM

Justin G. Randall, Esq.

2 Nevada Bar No. 12476

GLEN LERNER INJURY ATTORNEYS

3 4795 South Durango Drive

Las Vegas, Nevada 89147

4 (702) 877-1500

[jrandall@glenlerner.com](mailto:jrandall@glenlerner.com)

5 Attorneys for Plaintiff

DISTRICT COURT

CLARK COUNTY, NEVADA

8 GLEN LERNER INJURY ATTORNEYS, a Nevada  
Corporation,

9 Plaintiffs,

10 v.

11 LAKE MEAD EMERGENCY PHYSICIANS, LLC, a Nevada  
Limited Liability Company; CMRE FINANCIAL SERVICES,  
12 INC., a California Corporation; NORTH VISTA HOSPITAL,  
INC., a Delaware Corporation; ORSOSITO, LIMITED  
13 LIABILITY COMPANY, a Nevada Limited Liability Company  
d/b/a COMPLETE CARE MEDICAL CENTER; JAGET,  
14 LTD., a Nevada Corporation d/b/a SPINAL  
REHABILITATION CENTERS; CHW NEVADA IMAGING  
15 COMPANY, LLC, a Nevada Limited Liability Company d/b/a  
Nevada Imaging Centers; HEALTHCARE SYSTEMS, INC., a  
16 Washington Corporation d/b/a HSI; AGATA/VENGER  
PARTNERSHIP, LLP, a Nevada Limited Liability Partnership  
17 d/b/a WESTERN REGIONAL CENTER FOR BRAIN AND  
SPINE SURGERY; CLARK COUNTY COLLECTION  
18 SERVICE, LLC, a Nevada Limited Liability Company;  
SUNRISE MOUNTAINVIEW HOSPITAL, INC., a Nevada  
19 Corporation; WEST VALLEY IMAGING LIMITED  
PARTNERSHIP, a Nevada Limited Partnership; NEVADA  
20 CREDICO, INC., a Nevada Corporation d/b/a QUANTUM  
COLLECTIONS; CENTENNIAL PAIN RELIEF NETWORK,  
21 INC., a Nevada Corporation d/b/a CENTENNIAL SPINE &  
PAIN; MOUNTAIN REHABILITATION SERVICES;  
22 MOIHARWIN DIVERSIFIED CORPORATION, a Nevada  
Corporation d/b/a VEGAS VALLEY COLLECTION  
23 SERVICE; LAS VEGAS NEUROSURGERY  
ORTHOPAEDICS AND REHABILITATION, LLP, a Nevada  
24 Limited Liability Partnership; DESERT ORTHOPAEDIC  
CENTER, LTD., a Nevada Corporation; ORTHOPEDIC  
25 MOTION, INC., a Nevada Corporation; CANYON MEDICAL  
BILLING, LLC, a Nevada Limited Liability Company; MED-  
26 CARE SOLUTIONS, LLC, a Nevada Limited Liability  
Company; NEW CENTURY REHABILITATION, LLC, a  
27 Nevada Limited Liability Company d/b/a MATT SMITH  
28

CASE NO. 4680317  
DEPT. NO. XIV

SUMMONS

PHYSICAL THERAPY; SDMI LIMITED PARTNERSHIP, A  
 NEVADA LIMITED PARTNERSHIP d/b/a STEINBERG  
 DIAGNOSTICS; KEY HEALTH MEDICAL SOLUTIONS,  
 INC., a California Corporation; RED ROCK DIAGNOSTICS; a  
 Nevada Limited Liability Company; BRIAN A. LEMPER, D.O.,  
 a Nevada Corporation; CARE REHAB AND ORTHOPAEDIC  
 PRODUCTS, INC., a Virginia Corporation d/b/a PROGENIX;  
 JOSEPH J. SCHIFINI, M.D., LTD., a Nevada Corporation;  
 RADAR MEDICAL GROUP, LLP, a Nevada Limited Liability  
 Partnership; DIAGNOSTIC IMAGING OF SOUTHERN  
 NEVADA LIMITED PARTNERSHIP, a Nevada Limited  
 Partnership; INSTITUTE OF ORTHOPAEDIC SURGERY,  
 LLC, a Nevada Limited Liability Company; NEVADA  
 ORTHOPEDIC & SPINE CENTER, LLP, a Nevada Limited  
 Liability Partnership; JEFFREY D. GROSS, M.D., INC., a  
 California Corporation d/b/a COMPREHENSIVE INJURY  
 INSTITUTE; OASIS WELLNESS CENTER, LLC, a California  
 Limited Liability Corporation; PAIN INSTITUTE OF  
 NEVADA, INC., a Nevada Corporation; JORGENSEN &  
 KOKA, LLP, a Nevada Limited Liability Partnership d/b/a  
 PRIMARY CARE CONSULTANTS; CARDIO VASCULAR  
 PLUS, INC., a California Corporation; NATIONWIDE CREDIT  
 RECOVERY, a California Corporation; TOM BROOKS LLC, a  
 Nevada Limited Liability Company d/b/a TOM BROOKS  
 PHYSICAL THERAPY & SPORTS MEDICINE; PRACTICE  
 ADMINISTRATIVE CONSULTANTS, a California  
 corporation d/b/a COAST RADIOLOGY AND IMAGING;  
 DIOGENES ANESTHESIA MEDICAL GROUP, INC., a  
 California Corporation; NATIONAL INTRA-OPERATIVE  
 MONITORING; PACIFIC HOSPITAL OF LONG BEACH;  
 JOJASO MANAGEMENT, INC., a Nevada Corporation;  
 PROGRESSIVE MOTION, INC., a Nevada Corporation;  
 MEDICAL INVESTMENT, INC., a Nevada Corporation d/b/a  
 PURE MEDICAL EQUIPMENT; VALLEY VIEW SURGERY  
 CENTER, LIMITED PARTNERSHIP, a Nevada Limited  
 Partnership f/k/a MEDICAL DISTRICT SURGERY; MISSION  
 HEALTHCARE SERVICES, INC., a California Corporation;  
 LAS VEGAS RADIOLOGY, LLC, a Nevada Limited Liability  
 Company; MEDICAL STRATEGY MANAGEMENT, INC., a  
 Nevada Corporation; LUKE R. WATSON, M.D., INC., a  
 California Corporation; WILSON-McSHANE  
 CORPORATION, a Minnesota Corporation; ACS RECOVERY  
 SERVICES, INC., an Illinois Corporation; HEALTH PLAN OF  
 NEVADA, INC., a Nevada Corporation; DOES I – V; and ROE  
 CORPORATIONS I – V;

Defendants.

...

1 NOTICE! YOU HAVE BEEN SUED, THE COURT MAY DECIDE AGAINST YOU WITHOUT YOUR  
2 BEING HEARD UNLESS YOU RESPOND WITHIN 20 DAYS, READ THE INFORMATION BELOW.

3 WILSON-McSHANE CORPORATION

4 TO THE DEFENDANT(S): A civil Complaint has been filed by the Plaintiff(s) against you for the relief set forth in  
5 the Complaint.

6 1. If you intend to defend this lawsuit, within 20 days after this Summons is served on you, exclusive of the day  
7 of service, you must do the following:

- 8 a. File with the Clerk of this Court, whose address is shown below, a formal written response to the  
9 Complaint in accordance with the rules of the Court, with the appropriate filing fee.  
10 b. Serve a copy of your response upon the attorney whose name and address is shown below.

11 2. Unless you respond, your default will be entered upon application of the Plaintiff(s) and this Court may enter  
12 a judgment against you for the relief demanded in the Complaint, which could result in the taking of money or  
13 property or other relief requested in the Complaint.

14 3. If you intend to seek the advice of an attorney in this matter, you should do so promptly so that your response  
15 may be filed on time.

16 4. The State of Nevada, its political subdivisions, agencies, officers, employees, board members, commission  
17 members and legislators, each have 45 days after service of this summons within which to file an answer or other  
18 responsive pleading to the complaint.

19 Issued at the direction of:

20 Justin G. Randall, Esq.  
21 Nevada Bar No. 12476  
22 4795 South Durango Drive  
23 Las Vegas, Nevada 89147  
24 Attorneys for Plaintiff

CLERK OF THE COURT

25 *Yelith Cerna*  
26 DEPUTY CLERK  
27 200 Lewis Avenue, 5<sup>th</sup> Floor  
28 Las Vegas, Nevada 89155-1601

APR 19 2013

DATE

*Kathrine Cardenas*

STATE OF NEVADA )  
 ) ss:  
 COUNTY OF CLARK )

**AFFIDAVIT OF SERVICE**

being duly sworn, says: That at all times herein affiant was and is a citizen of the United States, over 18 years of age, not a party to nor interested in the proceeding in which this affidavit is made. That affiant received the Summons and Complaint, on the \_\_\_\_\_ day of \_\_\_\_\_, 2013 and served the same on the \_\_\_\_\_ day of \_\_\_\_\_, 2013 by:

(Affiant must complete the appropriate paragraph)

1. Delivering and leaving a copy with the Defendant \_\_\_\_\_ at (state address) \_\_\_\_\_.
2. Serving the Defendant \_\_\_\_\_ by personally delivering and leaving a copy with \_\_\_\_\_, a person of suitable age and discretion residing at the Defendant's usual place of abode located at: (state address) \_\_\_\_\_.

(Use paragraph 3 for service upon agent, completing A or B)

3. Serving the Defendant \_\_\_\_\_ By personally delivering and leaving a copy at (state address) \_\_\_\_\_.
- a. With \_\_\_\_\_ as \_\_\_\_\_, an agent lawfully designated by statute to accept service of process;
- b. With \_\_\_\_\_, pursuant to NRS 14.020 as a person of suitable age and discretion at the above address, which address is the address of the resident agent as shown on the current certificate of designation filed with the Secretary of State.
4. Personally depositing a copy in a mail box of the United States Post Office, enclosed in a sealed envelope postage prepaid (Check appropriate method):
  - \_\_\_\_\_ Ordinary mail
  - \_\_\_\_\_ Certified mail, return receipt requested
  - \_\_\_\_\_ Registered mail, return receipt requested
 addressed to the defendant \_\_\_\_\_ at Defendant's last known address, which is (state address) \_\_\_\_\_.

SUBSCRIBED AND SWORN to before me this \_\_\_\_\_ day of \_\_\_\_\_, 2013.

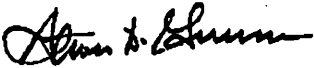
\_\_\_\_\_  
 Signature of person making service

NOTARY PUBLIC in and for the  
 County of Clark, State of Nevada

# EXHIBIT B

Electronically Filed  
04/17/2013 03:20:08 PM

CII  
Justin G. Randall, Esq.  
Nevada Bar No. 12476  
GLEN LERNER INJURY ATTORNEYS  
4795 South Durango Drive  
Las Vegas, Nevada 89147  
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[jrandall@glenlerner.com](mailto:jrandall@glenlerner.com)  
Attorney for Plaintiffs



CLERK OF THE COURT

DISTRICT COURT

CLARK COUNTY, NEVADA

GLEN LERNER INJURY ATTORNEYS, a Nevada Corporation,  
Plaintiffs,  
v.  
LAKE MEAD EMERGENCY PHYSICIANS, LLC, a Nevada Limited Liability Company; CMRE FINANCIAL SERVICES, INC., a California Corporation; NORTH VISTA HOSPITAL, INC., a Delaware Corporation; ORSOSITO, LIMITED LIABILITY COMPANY, a Nevada Limited Liability Company d/b/a COMPLETE CARE MEDICAL CENTER; JAGET, LTD., a Nevada Corporation d/b/a SPINAL REHABILITATION CENTERS; CHW NEVADA IMAGING COMPANY, LLC, a Nevada Limited Liability Company d/b/a Nevada Imaging Centers; HEALTHCARE SYSTEMS, INC., a Washington Corporation d/b/a HSI; AGATA/VENGER PARTNERSHIP, LLP, a Nevada Limited Liability Partnership d/b/a WESTERN REGIONAL CENTER FOR BRAIN AND SPINE SURGERY; CLARK COUNTY COLLECTION SERVICE, LLC, a Nevada Limited Liability Company; SUNRISE MOUNTAINVIEW HOSPITAL, INC., a Nevada Corporation; WEST VALLEY IMAGING LIMITED PARTNERSHIP, a Nevada Limited Partnership; NEVADA CREDICO, INC., a Nevada Corporation d/b/a QUANTUM COLLECTIONS; CENTENNIAL PAIN RELIEF NETWORK, INC., a Nevada Corporation d/b/a CENTENNIAL SPINE & PAIN; MOUNTAIN REHABILITATION SERVICES; MOIHARWIN DIVERSIFIED CORPORATION, a Nevada Corporation d/b/a VEGAS VALLEY COLLECTION SERVICE; LAS VEGAS NEUROSURGERY ORTHOPAEDICS AND REHABILITATION, LLP, a Nevada Limited Liability Partnership; DESERT ORTHOPAEDIC CENTER, LTD., a Nevada Corporation; ORTHOPEDIC MOTION, INC., a Nevada Corporation; CANYON MEDICAL

CASE NO. A-13-680317-C  
DEPT. NO. XIV

**COMPLAINT IN INTERPLEADER**  
*Action in Equity*  
*Exemption from Arbitration Requested*

1 BILLING, LLC, a Nevada Limited Liability Company; MED- )  
 2 CARE SOLUTIONS, LLC, a Nevada Limited Liability )  
 3 Company; NEW CENTURY REHABILITATION, LLC, a )  
 4 Nevada Limited Liability Company d/b/a MATT SMITH )  
 PHYSICAL THERAPY; SDMI LIMITED PARTNERSHIP, A )  
 5 NEVADA LIMITED PARTNERSHIP d/b/a STEINBERG )  
 6 DIAGNOSTICS; KEY HEALTH MEDICAL SOLUTIONS, )  
 7 INC., a California Corporation; RED ROCK DIAGNOSTICS, a )  
 8 Nevada Limited Liability Company; BRIAN A. LEMPER, D.O., )  
 9 a Nevada Corporation; CARE REHAB AND ORTHOPAEDIC )  
 10 PRODUCTS, INC., a Virginia Corporation d/b/a PROGENIX; )  
 11 JOSEPH J. SCHIFINI, M.D., LTD., a Nevada Corporation; )  
 12 RADAR MEDICAL GROUP, LLP, a Nevada Limited Liability )  
 13 Partnership; DIAGNOSTIC IMAGING OF SOUTHERN )  
 14 NEVADA LIMITED PARTNERSHIP, a Nevada Limited )  
 15 Partnership; INSTITUTE OF ORTHOPAEDIC SURGERY, )  
 16 LLC, a Nevada Limited Liability Company; NEVADA )  
 17 ORTHOPEDIC & SPINE CENTER, LLP, a Nevada Limited )  
 18 Liability Partnership; JEFFREY D. GROSS, M.D., INC., a )  
 19 California Corporation d/b/a COMPREHENSIVE INJURY )  
 20 INSTITUTE; OASIS WELLNESS CENTER, LLC, a California )  
 21 Limited Liability Corporation; PAIN INSTITUTE OF )  
 22 NEVADA, INC., a Nevada Corporation; JORGENSEN & )  
 23 KOKA, LLP, a Nevada Limited Liability Partnership d/b/a )  
 24 PRIMARY CARE CONSULTANTS; CARDIO VASCULAR )  
 25 PLUS, INC., a California Corporation; NATIONWIDE CREDIT )  
 26 RECOVERY, a California Corporation; TOM BROOKS LLC, a )  
 27 Nevada Limited Liability Company d/b/a TOM BROOKS )  
 PHYSICAL THERAPY & SPORTS MEDICINE; PRACTICE )  
 28 ADMINISTRATIVE CONSULTANTS, a California )  
 corporation d/b/a COAST RADIOLOGY AND IMAGING; )  
 DIOGENES ANESTHESIA MEDICAL GROUP, INC., a )  
 California Corporation; NATIONAL INTRA-OPERATIVE )  
 MONITORING; PACIFIC HOSPITAL OF LONG BEACH; )  
 JOJASO MANAGEMENT, INC., a Nevada Corporation; )  
 PROGRESSIVE MOTION, INC., a Nevada Corporation; )  
 MEDICAL INVESTMENT, INC., a Nevada Corporation d/b/a )  
 PURE MEDICAL EQUIPMENT; VALLEY VIEW SURGERY )  
 CENTER, LIMITED PARTNERSHIP, a Nevada Limited )  
 Partnership f/k/a MEDICAL DISTRICT SURGERY; MISSION )  
 HEALTHCARE SERVICES, INC., a California Corporation; )  
 LAS VEGAS RADIOLOGY, LLC, a Nevada Limited Liability )  
 Company; MEDICAL STRATEGY MANAGEMENT, INC., a )  
 Nevada Corporation; LUKE R. WATSON, M.D., INC., a )  
 California Corporation; WILSON-McSHANE )  
 CORPORATION, a Minnesota Corporation; ACS RECOVERY )  
 SERVICES, INC., an Illinois Corporation; HEALTH PLAN OF )  
 NEVADA, INC., a Nevada Corporation; DOES I – V; and ROE )  
 CORPORATIONS I – V; )

Defendants.

1 COMES NOW the Plaintiff, GLEN LERNER INJURY ATTORNEYS, by and through its counsel  
2 of record, Justin G. Randall, Esq., of the law firm of GLEN LERNER INJURY ATTORNEYS, and brings  
3 this Complaint in Interpleader under Rule 22 of the Nevada Rules of Civil Procedure and for such causes of  
4 action alleges:  
5

6 I.

7 At all times relevant hereto, Plaintiff GLEN LERNER INJURY ATTORNEYS was and is a Nevada  
8 Professional Corporation duly organized and existing under the laws of the State of Nevada.  
9

10 II.

11 Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant  
12 LAKE MEAD EMERGENCY PHYSICIANS, LLC was and is a Nevada Limited Liability Company, duly  
13 organized and existing under the laws of the State of Nevada and doing business in Clark County, Nevada.  
14

15 III.

16 Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant  
17 CMRE FINANCIAL SERVICES, INC. was and is a California corporation, existing under the laws of the  
18 State of Nevada and doing business in Clark County, Nevada.  
19

20 IV.

21 Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant  
22 NORTH VISTA HOSPITAL, INC. was and is a Delaware corporation, existing under the laws of the State  
23 of Nevada and doing business in Clark County, Nevada.  
24  
25  
26  
27  
28

V.

Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant ORSOSITO, LIMITED LIABILITY COMPANY was and is a Nevada Limited Liability Company d/b/a COMPLETE CARE MEDICAL CENTER, duly organized and existing under the laws of the State of Nevada and doing business in Clark County, Nevada.

VI.

Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant JAGET, LTD. was and is a Nevada corporation d/b/a SPINAL REHABILITATION CENTERS, duly organized and existing under the laws of the State of Nevada and doing business in Clark County, Nevada.

VII.

Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant CHW NEVADA IMAGING COMPANY, LLC was and is a Nevada Limited Liability Company d/b/a Nevada Imaging Centers, duly organized and existing under the laws of the State of Nevada and doing business in Clark County, Nevada.

VIII.

Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant HEALTHCARE SYSTEMS, INC. was and is a Washington corporation d/b/a HIS, existing under the laws of the State of Nevada and doing business in Clark County, Nevada.

IX.

Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant AGATA/VENGER PARTNERSHIP, LLP was and is a Nevada Limited Liability Partnership d/b/a WESTERN REGIONAL CENTER FOR BRAIN AND SPINE SURGERY, duly organized and existing under the laws of the State of Nevada and doing business in Clark County, Nevada.

1 X.

2 Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant  
3 CLARK COUNTY COLLECTION SERVICE, LLC was and is a Nevada Limited Liability Company, duly  
4 organized and existing under the laws of the State of Nevada and doing business in Clark County, Nevada.  
5

6 XI.

7 Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant  
8 SUNRISE MOUNTAINVIEW HOSPITAL, INC. was and is a Nevada Corporation, duly organized and  
9 existing under the laws of the State of Nevada and doing business in Clark County, Nevada.  
10

11 XII.

12 Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant  
13 WEST VALLEY IMAGING LIMITED PARTNERSHIP was and is a Nevada Limited Partnership, duly  
14 organized and existing under the laws of the State of Nevada and doing business in Clark County, Nevada.  
15

16 XIII.

17 Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant  
18 NEVADA CREDICO, INC. was and is a Nevada Corporation d/b/a QUANTUM COLLECTIONS, duly  
19 organized and existing under the laws of the State of Nevada and doing business in Clark County, Nevada.  
20

21 XIV.

22 Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant  
23 CENTENNIAL PAIN RELIEF NETWORK, INC. was and is a Nevada Corporation d/b/a CENTENNIAL  
24 SPINE & PAIN, duly organized and existing under the laws of the State of Nevada and doing business in  
25 Clark County, Nevada.  
26  
27  
28

1 XV.

2 Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant  
3 MOUNTAIN REHABILITATION SERVICES was and is a duly licensed establishment practicing under  
4 the laws of the State of Nevada and doing business in Clark County, Nevada.  
5

6 XVI.

7 Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant  
8 MOIHARWIN DIVERSIFIED CORPORATION was and is a Nevada Corporation d/b/a VEGAS VALLEY  
9 COLLECTION SERVICE, duly organized and existing under the laws of the State of Nevada and doing  
10 business in Clark County, Nevada.  
11

12 XVII.

13 Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant  
14 LAS VEGAS NEUROSURGERY ORTHOPAEDICS AND REHABILITATINO, LLP was and is a Nevada  
15 Limited Liability Partnership, duly organized and existing under the laws of the State of Nevada and doing  
16 business in Clark County, Nevada.  
17

18 XVIII.

19 Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant  
20 DESERT ORTHOPAEDIC CENTER, LTD. was and is a Nevada Corporation, duly organized and existing  
21 under the laws of the State of Nevada and doing business in Clark County, Nevada.  
22

23 XIX.

24 Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant  
25 ORTHOPEDIC MOTION, INC. was and is a Nevada Corporation, duly organized and existing under the  
26 laws of the State of Nevada and doing business in Clark County, Nevada.  
27  
28

XX.

Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant CANYON MEDICAL BILLING, LLC was and is a Nevada Limited Liability Company, duly organized and existing under the laws of the State of Nevada and doing business in Clark County, Nevada.

XXI.

Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant MED-CARE SOLUTIONS, LLC was and is a Nevada Limited Liability Company, duly organized and existing under the laws of the State of Nevada and doing business in Clark County, Nevada.

XXII.

Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant NEW CENTURY REHABILITATION, LLC was and is a Nevada Limited Liability Company d/b/a MATT SMITH PHYSICAL THERAPY, duly organized and existing under the laws of the State of Nevada and doing business in Clark County, Nevada.

XXIII.

Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant SDMI LIMITED PARTNERSHIP, A NEVADA LIMITED PARTNERSHIP was and is a Nevada Limited Partnership d/b/a STEINBERG DIAGNOSTICS, duly organized and existing under the laws of the State of Nevada and doing business in Clark County, Nevada.

XXIV.

Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant KEY HEALTH MEDICAL SOLUTIONS, INC. was and is a California Corporation, existing under the laws of the State of Nevada and doing business in Clark County, Nevada.

1 XXV.

2 Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant  
3 RED ROCK DIAGNOSTICS was and is a Nevada Limited Liability Company, duly organized and existing  
4 under the laws of the State of Nevada and doing business in Clark County, Nevada.  
5

6 XXVI.

7 Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant  
8 BRIAN A. LEMPER, D.O. was and is a Nevada Corporation, duly organized and existing under the laws of  
9 the State of Nevada and doing business in Clark County, Nevada.  
10

11 XXVII.

12 Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant  
13 CARE REHAB AND ORTHOPAEDIC PRODUCTS, INC. was and is a Virginia Corporation d/b/a  
14 PROGENIX, existing under the laws of the State of Nevada and doing business in Clark County, Nevada.  
15

16 XXVIII.

17 Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant  
18 JOSEPH J. SCHIFINI, M.D., LTD. was and is a Nevada Corporation, duly organized and existing under the  
19 laws of the State of Nevada and doing business in Clark County, Nevada.  
20

21 XXIX.

22 Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant  
23 RADAR MEDICAL GROUP, LLP was and is a Nevada Limited Liability Partnership, duly organized and  
24 existing under the laws of the State of Nevada and doing business in Clark County, Nevada.  
25

26 XXX.

27 Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant  
28 DIAGNOSTIC IMAGING OF SOUTHERN NEVADA LIMITED PARTNERSHIP was and is a Nevada

1 Limited Partnership, duly organized and existing under the laws of the State of Nevada and doing business  
2 in Clark County, Nevada.

3  
4 XXXI.

5 Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant  
6 INSTITUTE OF ORTHOPAEDIC SURGERY, LLC was and is a Nevada Limited Liability Company, duly  
7 organized and existing under the laws of the State of Nevada and doing business in Clark County, Nevada.

8  
9 XXXII.

10 Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant  
11 NEVADA ORTHOPEDIC & SPINE ENTER, LLP was and is a Nevada Limited Liability Partnership, duly  
12 organized and existing under the laws of the State of Nevada and doing business in Clark County, Nevada.

13  
14 XXXIII.

15 Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant  
16 JEFFREY D. GROSS, M.D., INC. was and is a California Corporation d/b/a COMPREHENSIVE INJURY  
17 INSTITUTE, existing under the laws of the State of Nevada and doing business in Clark County, Nevada.

18  
19 XXXIV.

20 Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant  
21 OASIS WELLNESS CENTER, LLC was and is a California Limited Liability Corporation, existing under  
22 the laws of the State of Nevada and doing business in Clark County, Nevada.

23  
24 XXXV.

25 Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant  
26 PAIN INSTITUTE OF NEVADA, INC. was and is a Nevada Corporation, duly organized and existing  
27 under the laws of the State of Nevada and doing business in Clark County, Nevada.  
28

1 XXXVI.

2 Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant  
3 JORGENSON & KOKA, LLP was and is a Nevada Limited Liability Partnership d/b/a PRIMARY CARE  
4 CONSULTANTS, duly organized and existing under the laws of the State of Nevada and doing business in  
5 Clark County, Nevada.  
6

7 XXXVII.

8 Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant  
9 CARDIO VASCULAR PLUS, INC. was and is a California Corporation, existing under the laws of the  
10 State of Nevada and doing business in Clark County, Nevada.  
11

12 XXXVIII.

13 Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant  
14 NATIONWIDE CREDIT RECOVERY was and is a California Corporation, existing under the laws of the  
15 State of Nevada and doing business in Clark County, Nevada.  
16

17 XXXIX.

18 Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant  
19 TOM BROOKS LLC was and is a Nevada Limited Liability Company d/b/a TOM BROOKS PHYSICAL  
20 THERAPY & SPORTS MEDICINE, duly organized and existing under the laws of the State of Nevada and  
21 doing business in Clark County, Nevada.  
22

23 XL.

24 Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant  
25 PRACTICE ADMINISTRATIVE CONSULTANTS was and is a California Corporation d/b/a COAST  
26 RADIOLOGY AND IMAGING, existing under the laws of the State of Nevada and doing business in Clark  
27 County, Nevada.  
28

1 **XLII.**

2 Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant  
3 DIOGENES ANESTHESIA MEDICAL GROUP was and is a California Corporation, existing under the  
4 laws of the State of Nevada and doing business in Clark County, Nevada.  
5

6 **XLII.**

7 Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant  
8 NATIONAL INTRA-OPERATIVE MONITORING was and is a California company, existing under the  
9 laws of the State of Nevada and doing business in Clark County, Nevada.  
10

11 **XLIII.**

12 Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant  
13 PACIFIC HOSPITAL OF LONG BEACH was and is a California company, existing under the laws of the  
14 State of Nevada and doing business in Clark County, Nevada.  
15

16 **XLIV.**

17 Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant  
18 JOJASO MANAGEMENT, INC. was and is a Nevada Corporation, duly organized and existing under the  
19 laws of the State of Nevada and doing business in Clark County, Nevada.  
20

21 **XLV.**

22 Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant  
23 PROGRESSIVE MOTION, INC. was and is a Nevada Corporation, duly organized and existing under the  
24 laws of the State of Nevada and doing business in Clark County, Nevada.  
25

26 **XLVI.**

27 Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant  
28 MEDICAL INVESTMENT, INC. was and is a Nevada Corporation d/b/a PURE MEDICAL EQUIPMENT,  
29

1 duly organized and existing under the laws of the State of Nevada and doing business in Clark County,  
2 Nevada.

3  
4 **XLVII.**

5 Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant  
6 VALLEY VIEW SURGERY CENTER, LIMITED PARTNERSHIP was and is a Nevada Limited  
7 Partnership d/b/a MEDICAL DISTRICT SURGERY, duly organized and existing under the laws of the  
8 State of Nevada and doing business in Clark County, Nevada.

9  
10 **XLVIII.**

11 Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant  
12 MISSION HEALTHCARE SERVICES, INC. was and is a Nevada Corporation, existing under the laws of  
13 the State of Nevada and doing business in Clark County, Nevada.

14  
15 **XLIX.**

16 Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant  
17 LAS VEGAS RADIOLOGY, LLC was and is a Nevada Limited Liability Company, duly organized and  
18 existing under the laws of the State of Nevada and doing business in Clark County, Nevada.

19  
20 **L.**

21 Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant  
22 MEDICAL STRATEGY MANAGEMENT, INC. was and is a Nevada Corporation, duly organized and  
23 existing under the laws of the State of Nevada and doing business in Clark County, Nevada.

24  
25 **LI.**

26 Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant  
27 LUKE R. WATSON, M.D., INC. was and is a California Corporation, existing under the laws of the State  
28 of Nevada and doing business in Clark County, Nevada.

LII.

Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant WILSON-McSHANE CORPORATION was and is a Minnesota Corporation, existing under the laws of the State of Nevada and doing business in Clark County, Nevada.

LIII.

Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant ACS RECOVERY SERVICES, INC. was and is an Illinois Corporation, existing under the laws of the State of Nevada and doing business in Clark County, Nevada.

LIV.

Plaintiff is informed and believes and thereupon alleges that at all times relevant hereto, Defendant HEALTH PLAN OF NEVADA, INC. was and is a Nevada Corporation, duly organized and existing under the laws of the State of Nevada and doing business in Clark County, Nevada.

LV.

Plaintiff GLEN LERNER INJURY ATTORNEYS entered into a valid lawyer's contingency retainer agreement with DINA HAMILTON whereby DINA HAMILTON agreed to pay Plaintiff 40% of any award recovered in addition to all costs associated with pursuing his claim for personal injuries against ELVA ORTEGA and her insurance company, American Family Insurance Company.

LVI.

GLEN LERNER INJURY ATTORNEYS has recovered personal injury proceeds in the amount of \$300,000.00 on behalf of DINA HAMILTON for her claims against ELVA ORTEGA and her insurance company, American Family Insurance Company.

1 LVII.

2 GLEN LERNER INJURY ATTORNEYS is entitled to attorney's fees in the amount of \$120,000.00,  
3 which is 40% of the "total recovery" per the retainer contract and is entitled to costs in the amount of  
4 \$45,472.12.  
5

6 LVIII.

7 Each of the Defendants herein is owed money and has an existing lien on DINA HAMILTON's  
8 settlement for medical services and treatment provided to him from a motor vehicle accident that occurred  
9 on 01/05/07 in Clark County, Nevada.  
10

11 LIX.

12 Each of the Defendants claim some right, entitlement, interest or benefit of the settlement funds  
13 based upon an existing lien.  
14

15 LX.

16 The amount of the liens for medical treatment and services collectively, exceeds the amount of the  
17 settlement funds available.

18 LXI.

19 GLEN LERNER INJURY ATTORNEYS cannot safely determine without hazard to itself, to whom  
20 the proceeds of the settlement should be paid, and how the proceeds should be divided. As such, it has  
21 become necessary to file the Complaint for Interpleader.  
22

23 LXII.

24 GLEN LERNER INJURY ATTORNEYS has brought this Complaint in good faith and without  
25 collusion with any parties hereto. As directed by the Court, GLEN LERNER INJURY ATTORNEYS will  
26 deposit the sum of \$300,000.00 and said proceeds may be held by the Court, or its designee, pending the  
27 resolution of the competing claims of the parties herein.  
28

LXIII.

Plaintiff is entitled to a full and final release of all medical liens in exchange for individual amounts to be determined by the Court.

WHEREFORE, Plaintiff GLEN LERNER INJURY ATTORNEYS expressly reserving its right to amend its Complaint at the time of the hearing of the action herein to include all Defendants not yet ascertained, prays as follows:

1. That Defendants appear and answer to establish whatever claims they have with respect to the settlement proceeds;

2. That the Court order immediate payment to GLEN LERNER INJURY ATTORNEYS out of the Interpleader funds the amount of \$120,000.00 for attorney's fees and the sum of \$45,472.12 for its costs based upon its valid lien and pursuant to its statutory priority;

3. That the Court determine which of the parties is entitled to the proceeds of the award and to what extent each party shall rightfully be paid;

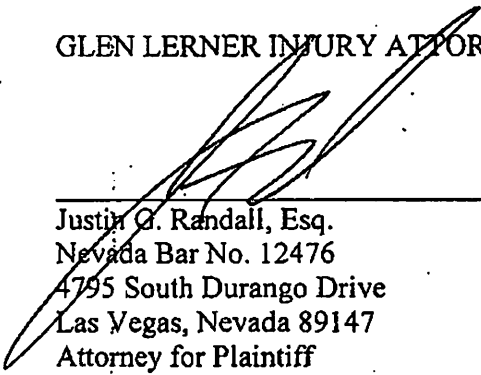
4. That the Court award reasonable attorney's fees to the undersigned counsel by reason of necessity of bringing this action;

5. For costs incurred herein; and

6. That the Court afford any further relief as it may deem just and proper.

DATED this 11<sup>th</sup> day of April, 2013.

GLEN LERNER INJURY ATTORNEYS

  
Justin G. Randall, Esq.  
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Las Vegas, Nevada 89147  
Attorney for Plaintiff